

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NIHAD ROSIC,

Defendant.

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No. 4:15 CR 00049 CDP

DEFENDANT ROSIC’S OBJECTIONS TO PRESENTENCE REPORT

Comes now Defendant NIHAD ROSIC, by and through counsel, and for his Objections to the Presentence Investigation Report (hereinafter referred to as “PSR”), states as follows:

1. Defendant and Counsel have reviewed the Presentence Report (Doc 698).
2. Defendant specifically objects to the following facts and matters contained in the Presentence Investigation Report, none of which impact the calculations under the United States Sentencing Guidelines:

A. **Offense Conduct, ¶ 24, p. 7:** Defendant objects to the second sentence in this paragraph, that is, “Investigation has determined Pazara trained **Nihad Rosic** on operating a sniper rifle prior to his departure.” (Emphasis in original). There was absolutely no evidence provided that Pazara trained Defendant on how to operate “sniper rifle prior to his departure.” Defendant concedes that there is a photograph of both Pazara and Defendant together – however, there is absolutely no evidence to support the allegation that Pazara trained Defendant on any firearm, at any time.

B. **Offense Conduct, ¶ 35, p. 10:** Defendant objects to the inclusion of this information in this paragraph inasmuch as it is in error and, rather, refers to a conversation of April 9, 2014, between Co-Defendant Ramiz Hodzic and Nermin Pazara.

C. **Offense Conduct, ¶ 52, p. 14:** Defendant objects to the characterization of his role as equal in culpability with Co-Defendant Ramiz Hodzic. While Defendant Rosic acknowledges his actions as set forth in the Plea Agreement (Doc. 683), he does not believe that his actions rise to or are equal to that culpability of Co-Defendant Hodzic.

Respectfully submitted

/s/ **JoANN TROG**

JoANN TROG #42725MO

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Matthew T. Drake, Assistant United States Attorney 111 South 10th Street, 20th Floor, St. Louis, Missouri 63102.

I hereby certify that on June 16, 2020, a copy of the foregoing was sent to Vashall R. Anderson, United States Probation Officer, via e-mail (Vashell_Anderson@moep.uscourts.gov), 111 South 10th Street, Suite 2.325, St. Louis, Missouri 63102.

/s/ **JoANN TROG**